

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Zuavey Kadafi
plaintiff,

v.

Civil Action No. 06-684 KAS
MRT

Lawrence Sullivan
John Edinger
Brendan O'Neill,
defendants,



BD scanned

Motion to Amend Complaint

Comes now, plaintiff Zuavey Kadafi, a prose litigant hereby requests that this court permit him to amend his complaint.

Litigant moves to amend his complaint by restating averments in his initial complaint and hereby state the following to be new developed complaints against the defendants.

In the month of November counsel John Edinger sent a continuance request form to the Superior Court and lied about the reasons plaintiff wanted

a continuance by stating "Defendant has informed counsel that he plans to hire private Counsel to represent him at trial and wishes his case to be rescheduled"

This is a complete untruth as plaintiff has not even communicated no such communication.

On November 28, 06, plaintiff was transported to Court and Counsel John Edinger discharged his official duty to provide advisement as to the negotiation of a plea bargain. A plea was negotiated between state prosecutor (Ipek Medford) and plaintiff (Zuavey Kadali) when plaintiff turn for assistance from Counsel John Edinger. Counsel at that time raised his hands and threaten to walk out, thus failing to provide legal representation and advisement.

Counsel John Edinger, has discourage the attempts of plaintiff to submit clearly merit-
~~orious~~ pretrial motions. His attitude of apathy has been a total incompetent act to discourage plaintiff from asserting his legal rights.

RELIEF SOUGHT

- (1) That he be suspended from engaging in the practice of law as a member of the Delaware Bar for a period of three years. (John Edinger)
- (2) That Edinger be reprimanded publicly.
- (3) That all others named be publicly reprimanded.

Frederick Rodger

12-25-06

